

HUGHES & BENTZEN, PLLC

ATTORNEYS AT LAW
1100 CONNECTICUT AVENUE, NW
SUITE 340
WASHINGTON, DC 20036

(202) 293-8975 (202) 659-3340
FACSIMILE (202) 293-8973
WWW.HUGHESBENTZEN.COM

MICHAEL P. BENTZEN, P.C., DC, MD
GEORGE J. HUGHES, DC, MD
ELIZABETH HUGHES, DC, MD
PHILIP J. MCNUTT, P.C., DC, MD
CHRISTOPHER WHEELER, DC, MD
JAMES A. KAMINSKI, DC, IL*

*NOT ADMITTED IN MARYLAND

OF COUNSEL
BRUCE S. DEMING, DC, VA*
STUART H. SORKIN, FL, DC *

OTHER OFFICES:
ROCKVILLE, MARYLAND

January 29, 2010

CONFIDENTIAL

Kathryn C. Decker
Federal Trade Commission
915 Second Ave., Ste. 2896
Seattle, WA 98174

Dear Casey:

This letter contains the first response of JustThink Media ("JTM") to your request for answers to Written Interrogatories and submission of Documentary Materials dated January 8, 2010. As we have stated to you on a number of occasions, JTM wishes to cooperate with you to provide the information requested both voluntarily and expeditiously.

As we agreed in our telephone conference held on January 21, 2010, the scope of this inquiry is limited to August 2007 to the present which represents the timeframe when JTM has offered consumer products (excluding software) over the internet. We further agreed that the information requested would be provided to you on a "rolling basis." This first submission includes information and documents pertaining to 2009 and 2010, including but not limited to, electronic copies of the web sites at issue. The second production will contain 2009 "transactional" data and will be delivered on February 16, 2010. The rest of the information will be transmitted on February 26, 2010.

Please be advised that this response represents a good faith attempt to provide the information requested. To the extent that responsive items were not included, such omissions were inadvertent. If JTM discovers responsive documents that were not produced, it will supplement this response.

The information provided herein contains trade secrets and other sensitive commercial information. As such, this letter constitutes a request for confidentiality pursuant to 15 U.S.C. §§ 46(f), 57b-2 and 16 C.F.R. §§ 4.10-4.11.

Your original requests are reprinted below in ***bold italics***. They are immediately followed by JTM's response.

WRITTEN INTERROGATORIES

1. Please state the correct legal name and address of each of you¹ companies and any dbas, the date and state/province of incorporation, where applicable; and the correct legal name(s) and address(es) of all parent, subsidiary or affiliated businesses or companies, including any joint ventures. Explain the nature of the relationship between each parent, subsidiary, affiliated business or company, or any joint venture, including any overlapping officers, directors, and/or owners. State the names of all officers and directors of each company and, if it is a privately-held corporation, state the names and percentages of ownership of all stockholders in each company.

A document that contains information responsive to this request is submitted herewith as JTM-I 00001. JTM continues to research the relationship data you requested and will supplement this request accordingly.

2. Please list the states/provinces in which each of your companies is licensed to do business or in which each conducts or has conducted business since January 1, 2006. Provide a copy of each business license, registration or permit issued to each company by any state/provincial or local government entity.

JTM believes that it is able to conduct business in the United States and Canada without separate business licenses or other registrations. Places of incorporation are noted in the chart attached as JTM-I 00001.

3. Please provide the name and job title of each manager and employee of each company and describe each such person's duties within that company.

A document that contains information responsive to this request is submitted herewith as JTM-I 00002.

4. Please provide the total sales for each company, broken down by month and year and by dollar amount.

By agreement with the FTC, this information will be produced on a later date.

¹ "Your" and "You" includes Jesse Willms and all companies he owns and operates, directly or indirectly.

5. *Please list all of the products promoted, marketed, or sold by each of your companies.*

A document that contains information responsive to this request is submitted herewith as JTM-I 00003.

6. *For each year and each month since January 1, 2006, please provide for each company:*

- a. The number of sales of individual online memberships;*
- b. The dollar sales of online memberships;*
- c. The number of customers who have canceled their online membership within the applicable cancellation window;*
- d. The number of customers who have canceled their online membership after having been charged the monthly membership fee, but before they have purchased any product from the company's online club;*
- e. The number of customers who have purchased products from the company's online club;*
- f. The number of customers who have requested a partial or total refund of the online membership fees they paid to the company;*
- g. The number of customers to whom the company has refunded, in whole or in part, online membership fees; and*
- h. The total dollars refunded to online members who requested a refund of their membership fees;*
- i. The total complaints received by the company from customers, online members, affiliates, suppliers and services providers (including the subject of each complaint, if that information is collected in the ordinary course of business); and*
- j. The name, address, and telephone number of those customers who sent complaints, as referred to in Request No. 6(i).*

By agreement with the FTC, this information will be produced on a later date.

7. *Please describe all media used to promote, market, or sell each of your products. For products promoted, marketed, or sold via the internet, provide the following information for each website:*

- a. The website address;*
- b. The web host for the website;*
- c. The time period during which the website was running; and*
- d. The product(s) offered on that website.*

Confidential

A document that contains information responsive to this request is submitted herewith as JTM-I 00003.

8. *Please provide the name, address, and telephone numbers of each person or entity who participates or has participated in the development of the websites referred to in Request No. 7, including the content contained in the websites, together with a description of the participation by each such person or entity.*

Bart Calendar
Calendar Communications
Copywriting
42 Rue Alexandre Cabanel
Montpellier
France, 32000
Tel: (011)-3-395-285-5562

Nethues Technologies Pvt., Ltd
4th Floor
N N Mall
Manglam Palace , Delhi 110085
India
Tel: (91)-11-47567702

9. *Please provide the name, address, and telephone number of each person or entity who is or has been responsible for fulfilling consumers' orders for products promoted, marketed, or sold by you.*

A document that contains information responsive to this request is submitted herewith as JTM-I 00004.

10. *Please provide the name, address, and telephone number of each person or entity who is or has been responsible for handling customer service issues and customer complaints regarding products promoted, marketed, or sold by you.*

A document that contains information responsive to this request is submitted herewith as JTM-I 00005. This response excludes information related to the handling of consumer complaints filed with state regulatory agencies, which are handled by counsel. (See JTM 00001-4769).

HUGHES & BENTZEN, PLLC

Confidential

11. Please provide the name, address, and telephone number of any third party supplier of products promoted, marketed, or sold by you.

A document that contains information responsive to this request is submitted herewith as JTM-I 00006.

12. Please provide the name, address, and telephone number of all advertising networks that you or your companies have retained for provision of services.

A document that contains information responsive to this request is submitted herewith as JTM-I 00007-00008.

13. Please provide the name, address, and telephone number of all affiliate marketing companies who have promoted, marketed, or sold on your behalf. For each affiliate marketer, identify the names of the product(s) it promoted, marketed, or sold, and the time period during which the product(s) was promoted, marketed, sold.

ROI Revolution
3109 Poplarwood Ct., Suite 219
Raleigh, NC 27604
Tel: (919) 954-5955

14. Please list all enforcement actions and law suits brought against you related to the promoting, marketing, or sale of any product sold including, but not limited to, online memberships.

Chambelain v. Integraclick, Inc., Just Think Media, Case No. 09 CA 4695 (In the Circuit Court for the Second Judicial Circuit in and for Leon County, Florida, Civil Division 12/2/09).

Dazzle Smile and Optimal Health Sciences, LLC v. Epic Advertising, 1021018 Alberta Ltd. aka Just Think Media, et al., Case No. 2:09-CV-1043 (D. Utah, 11/18/09).

Dr. Mehmet Oz v. FMW Laboratories, Inc. v. CPX Interactive, JDW Media, LLC, Case No. 09-CV-7297 (S.D.N.Y. 8/12/09).

Consumerinfo.com Inc. v. Jesse Willms et al., Case No. SACV090055 (C.D. Cal. 1/13/09).

Utah Attorney General

HUGHES & BENTZEN, PLLC

Confidential

15. Please provide the address of each post office box and private mail receiving agency in the United States, Canada, or elsewhere that you use or have used, and the time period during which each address was used.

A document that contains information responsive to this request is submitted herewith as JTM-I 00009.

16. Please state whether you use consumers' responses to your websites for the purpose of compiling direct marketing lists. If you do compile direct marketing lists from consumers' responses to your websites, state precisely what information you collect from those responses and what information you make available for sale or rent to third parties.

JTM represents in good faith that it does not compile lists for direct marketing purposes, although it is permitted to do so under the privacy policies posted on the web sites at issue. JTM will continue to research this response and will amend it if JTM becomes aware of any instance where such marketing occurred.

DOCUMENTARY MATERIALS

17. A copy of each organization chart and personnel directory in effect since January 1, 2006, for each of your companies as a whole.

A document that contains information responsive to this request is submitted herewith as JTM-I 00002.

18. Copies of all disseminated advertisements or promotional materials including, but not limited to, internet advertisements, websites, print ads, radio ads, television ads, and recorded messages, referring or relating to each company's online club or other products sold, marketed or distributed by or through the company.

Documents that contain responsive information are provided on JTM-CD 00001. The documents were created in a variety of formats rendering hard copy production difficult. Nevertheless, JTM is willing to provide printouts if requested, but would require additional time to do so.

JTM is gathering product samples in their original packaging. JTM will provide the samples to the FTC under separate cover as soon as possible.

HUGHES & BENTZEN, PLLC

19. For each website identified in response to Request No. 21, provide a complete printout of the entire site, as well as an electronic copy of the entire website. Please refer to the instructions regarding submission of magnetic media.

Subject to the comments set forth in response to Request No. 18, documents that contain responsive information are provided on JTM-CD 00001.

20. All documents relating to your decision to make membership in your online clubs subject to a "negative option" or "continuity plan."

JTM did not identify any documents responsive to this request.

21. Copies of all documents prepared by you, or by any other person or entity on your behalf, relating or referring to data or analyses of consumer perception, comprehension or recall (including, but not limited to, copy tests, marketing or consumer surveys, penetration tests, marketing recall tests, audience reaction tests, and communication tests) of any websites used in the marketing of all products. Also provide copies of any other market research or media or copy strategies prepared by you, or by any other person or entity on your behalf, regarding consumer attitudes or beliefs about negative option programs or continuity plans.

Responsive documents are contained on JTM-CD 00001.

22. Copies of all documents or communications (whether electronic, written or written recordings of oral communications) between you and any government agency including, but not limited to, the state/provincial attorneys general, as well as between you and any private consumer protection organization including, but not limited to, the Better Business Bureau, that refer or relate to products sold on the internet, including complaints and refund requests.

Documents that contain information responsive to this request are submitted herewith as JTM 00001-5456.

23. Copies of all documents or communications (whether electronic, written or written recordings of oral communications) between you and any consumer that refer or relate to products sold on the internet, including all complaints and refund requests.

Documents that contain information responsive to this request are submitted herewith as JTM 00001-5456.

24. All recordings made by or on behalf of each company of conversations or communications of any kind between the company and any purchaser or potential purchaser of the company's online membership.

By agreement with the FTC, this information will be produced on a later date.

25. Copies of all contracts or agreements between you and your suppliers, affiliates or service providers including, but not limited to, entities responsible for: providing the products sold to customers, handling fulfillment of customer orders, customer service, customer complaints, and providing of websites or arranging for the providing of websites.

By agreement with the FTC, this information will be produced on a later date.

26. Copies of all contracts or agreements between you and any person or entity that provides, or has provided, you with advertising services or arranged for the provision of advertising services including, but not limited to, creation, development, reviewing, testing, evaluating, approval, production, and dissemination of advertisements.

By agreement with the FTC, this information will be produced on a later date.

27. Copies of all documents, notes, memoranda, or communications (whether written or written memorializations of oral communications, or e-mail) between you and any person or entity referred to in Request No. 26 that refer or relate to the provision of advertising services or any proposed or disseminated advertisement.

By agreement with the FTC, this information will be produced on a later date.

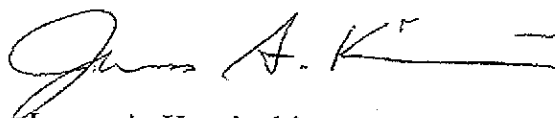
28. Copies of all records and documents identifying employees who have been reprimanded, sanctioned, or had their employment terminated for any reason.

JTM believes in good faith that it is not permitted to divulge this information to the FTC pursuant to the Province of Alberta's Personal Information Protection Act (PIPA). It will work with the FTC to provide any general information regarding this subject that the FTC requests.

Confidential

This information is provided to the FTC voluntarily. JTM reserves all rights it may have to proceed in this matter. This letter does not constitute a waiver of any of those rights or an admission of any kind.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.
Klein Zelman Rothermel LLP

HUGHES & BENTZEN, PLLC

Corporation Name	Address	City	Province/State	Country	ZIP
1016363 Alberta Ltd.	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3
1021018 Alberta Ltd	79 Charlton Road	Sherwood Park	Alberta	Canada	T8H 1R5
Coastwest Holdings Ltd.	Vasilissis Frederickssis, 33, 1st floor	Nicosia		Cyprus	P.C.1066
JD Media Group Inc.	11 Athabasca Avenue Suite 240	Sherwood Park	Alberta	Canada	T8A 6H2
JDW Media Inc.	P.O.Box 642 642 Main Street	Charlestown	Nevis	West Indies	
JTMJ Media Ltd	Unit 3 15-17 Caledonian Road P.O. Box 258	London	UK		N1 9DX
JDW Media LLC	2184 Channing Way # 322	Idaho Falls	ID	United States	83404
Software Wholesale Direct	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3
Blackenfore, Ltd.	17 Cleadon Street	Durham		United Kingdom	DH8 5LU
Farend Services, Ltd.	3 Athinodorou Street	Strovolos	Nicosia	Cyprus	
Colasdale Ltd.	11 Stormont Street	North Shields	Tyne And Wear	United Kingdom	NE29 OEY
Basiana Investments Ltd.	Address Verification In Progress				
Genta Holdings Ltd.	Address Verification In Progress				
Morgana Investments Ltd.	Address Verification In Progress				
Rivierco Trading Ltd.	Address Verification In Progress				

Registered Tradenames under 1021018 Alberta Ltd.

Company Name	Address	City	Province/State	Country	ZIP
Credit Report America	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3
eDirect Software	#204 85 Cranford Way	Sherwood Park	Alberta	Canada	T8H 0H9
(Partnership 1021018 Alberta Ltd. & 1016363 Alberta Ltd.)					
Just Think Media	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3
Wulongsource	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3
Wuyi Source	#2500, 10104 103Avenue	Edmonton	Alberta	Canada	T5J 1V3

JTM-I-1 000001

Last Name	First Name	Job Title	Duties
Adamson	Mark	Complaints Handling	Coordinate responses to customers, AG, BBB
Ahmed	Sameer	Optimization Coordinator	Design, optimization and testing of websites.
Anderson	Don	Quality Assurance	Website and customer service testing and quality assurance.
Bazinet	Kevin	Advertising Director	Advertising network coordination and communications.
Carr	Nancy	Operations Manager	Call center coordination and communications.
Dickson	Adam	Accounting	Accounting
Filler	Curtis	Accounting	Accounting
Kiedyk	Szymon	VP Marketing	Design task coordination.
Latourneau	Leanne	Advertising Executive	Research and advertising network communications.
Newell	Barbara	Operations Manager	Call center coordination and communications.
Ortigon	Herman	VP Operations	Oversee call center operations as well as new product supply
Penner	Jeff	Designer	Website, print, and creative design.
Roy	Susan	Office Manager	General office duties, phone and e-mail responses.
Schmitt	Hardie	Advertising Executive	Research and advertising network communications.
Smits	Nolan	Designer	Website, print, and creative design.
Stefaniuk	Mike	VP Engineering	Programming coordination and systems implementation.
Wiebe	Aaron	Research & Development	Competitor research.
Wilkins	Jesse	President/CEO	-

JTM-I 00002

Products offered	Website address	Web host for the files	Started On	Last Date	product(s) offered
AcaiBurn	acaiburn.com	174.143.19.252	9/29/2008	12/12/2009	AcaiBurn
AcaiBurn	acaiburnbody.com	174.143.19.252	3/7/2009	1/20/2010	AcaiBurn
AcaiBurn	acaiburnedge.com	174.143.19.252	6/22/2009	12/8/2009	AcaiBurn
AcaiBurn	acaiburnmax.com	174.143.19.252	11/2/2009	10/15/2009	AcaiBurn
AcaiBurn	acaiforceedge.com	174.143.19.252	6/10/2009	6/10/2009	AcaiBurn
AcaiBurn	acaiforcemax.com	174.143.19.252	7/31/2009	1/20/2010	AcaiBurn
AcaiBurn	acaiforcext.com	174.143.19.252	3/9/2009	11/23/2009	AcaiBurn
AcaiBurn	acaisslimdetox.com	174.143.19.252	4/8/2009	8/27/2009	AcaiBurn
AcaiBurn	acaisslimdetoxnow.com	174.143.19.252	9/17/2009	1/20/2010	AcaiBurn
AcaiBurn	acaisslimedge.com	174.143.19.252	5/8/2009	11/23/2009	AcaiBurn
AcaiBurn	acaisslimexclusive.com	174.143.19.252	9/15/2009	11/20/2009	AcaiBurn
AcaiBurn	acaisslimextra.com	174.143.19.252	2/11/2009	11/21/2009	AcaiBurn
AcaiBurn	acaisslimplus.com	174.143.19.252	7/31/2009	11/21/2009	AcaiBurn
LiftCream	clearliftultra.com	174.143.19.252	6/8/2009	11/23/2009	LiftCream
DazzleWhite	dazzlesmilesupreme.com	174.143.19.252	7/31/2009	9/14/2009	DazzleWhite
DazzleWhite	dazzlesmilenow.com	174.143.19.252	7/31/2009	9/14/2009	DazzleWhite
DazzleWhite	dazzlesmilepro.com	174.143.19.252	7/30/2009	10/30/2009	DazzleWhite
DazzleWhite	dazzlesmilepure.com	174.143.19.252	7/30/2009	10/23/2009	DazzleWhite
DazzleWhite	dazzlewhite.com	174.143.19.252	4/5/2009	4/8/2009	DazzleWhite
DazzleWhite	dazzlewhitenow.com	174.143.19.252	5/20/2009	8/17/2009	DazzleWhite
DazzleWhite	dazzlewhitepro.com	174.143.19.252	1/7/2009	10/8/2009	DazzleWhite
DazzleWhite	dazzlewhitepure.com	174.143.19.252	6/22/2009	12/8/2009	DazzleWhite
DazzleWhite	dazzlewhitesupreme.com	174.143.19.252	6/18/2009	6/21/2009	DazzleWhite
Digital Product	earncashfastwithgoogle.com	174.143.19.252	7/10/2008	6/11/2009	Digital Product
WuYiTea	easyweightlossstea.com	174.143.19.252	6/20/2008	12/12/2009	WuYiTea
Digital Product	onlinecashsuccesskit.com	174.143.19.252	8/14/2009	1/21/2010	Digital Product
AcaiBurn	premiumacaiburn.com	174.143.19.252	5/18/2009	11/8/2009	AcaiBurn
AcaiBurn	premiumacaisslim.com	174.143.19.252	7/31/2009	11/23/2009	AcaiBurn
DazzleWhite	premiumwhitepro.com	174.143.19.252	10/23/2009	1/21/2010	DazzleWhite
DazzleWhite	premiumwhitesource.com	174.143.19.252	11/13/2009	11/20/2009	DazzleWhite
DazzleWhite	premiumwhiteultra.com	174.143.19.252	10/23/2009	1/20/2010	DazzleWhite
AcaiBurn	proacaiburn.com	174.143.19.252	10/3/2009	10/16/2009	AcaiBurn
PCP	purecleansedetox.com	174.143.19.252	5/3/2009	6/10/2009	PCP
PCP	purecleansepro.com	174.143.19.252	12/18/2008	8/25/2009	PCP
PCP	purecleanseultra.com	174.143.19.252	5/3/2009	4/10/2009	PCP
LiftCream	pureliftcream.com	174.143.19.252	1/4/2009	12/8/2009	LiftCream
LiftCream	pureliftmax.com	174.143.19.252	4/5/2009	8/9/2009	LiftCream
LiftCream	pureliftultra.com	174.143.19.252	4/13/2009	8/17/2009	LiftCream
Resv	pureresv.com	174.143.19.252	3/17/2009	8/17/2009	Resv
Resv	purerezver.com	174.143.19.252	6/8/2009	11/19/2009	Resv
Digital Product	quickprofitkit.com	174.143.19.252	9/10/2009	10/14/2009	Digital Product
Digital Product	quickprofitkitpro.com	174.143.19.252	4/11/2009	11/20/2009	Digital Product
Resv	resvedge.com	174.143.19.252	3/17/2009	2/7/2009	Resv
Resv	Resvelite.com	174.143.19.252	3/25/2009	12/10/2009	Resv
Resv	resvsupreme.com	174.143.19.252	3/25/2009	6/24/2009	Resv
Digital Product	successgrants.com	174.143.19.252	8/13/2009	11/18/2009	Digital Product
PCP	ultimatepurecleanse.com	174.143.19.252	7/28/2009	1/21/2010	PCP
LiftCream	ultimatepurelift.com	174.143.19.252	5/13/2009	7/23/2009	LiftCream
AcaiBurn	ultraacaiburn.com	174.143.19.252	11/3/2009	3/11/2009	AcaiBurn
PCP	ultracleanseplus.com	174.143.19.252	7/8/2009	1/21/2010	PCP
PCP	ultrapurecleanse.com	174.143.19.252	5/26/2009	8/17/2009	PCP
WuYiTea	wu-yisource.com	174.143.19.252	6/1/2008	8/20/2009	WuYiTea

JTM-I 00003

Fulfillment	Address	Telephone	Contact
AtLast International	Wolseley Road Kempston, Bedford, Bedfordshire MK42 7UA 01234 840222	(303) 662-1041	Penny Christenson or Jim Gardner
AtLast Denver	11701 East 53rd Ave Denver, CO 80239	(303) 662-1041	Penny Christenson or Jim Gardner
RDP	1725 McPherson Court Pickering, ON L1W 3H9	(905) 837-9394	Robert Pinheiro
EDS Aus	PO Box 221 Blackburn, VIC 3130 Australia	(604) 460-7118 (515) 237-4592	Andy Pulleyblank or Kathryn Asher
EDS	3600 Army Post Road Des Moines IA 50321-2906	(604) 460-7118 (515) 237-4592	Andy Pulleyblank or Kathryn Asher

JTM-I 00004

1. Just Think Media, Complaint Handling

Hernan Ortegon-Rico, V.P. Operations
Barbara Newell, Operations Manager
Nancy Carr, Operations Manager
Mark Adamson, Public Relations
Susan, Office Manager
780-416-0244
Suite 204, 85 Cranford Way
Sherwood Park, Alberta, Canada
T8H 0H9

2. We Answer

Rhonda Alewine, Office manager
904-421-6200
6639 South Point Parkway, Suite 104
Jacksonville, FL 32216

3. GC Services

Julio Avila, Operations manager
915-231-4727

4. Net Hues India

414, NN Mall, Mangalam Palace
Sector 3, Rohini
Delhi, India
110085

**JUST THINK
MEDIA**

**Supplier Listing
2009**

Supplier	Address	City	State	ZIP	Phone No.	Email
Dentech	1550 Deer Park	Angwin	CA	94508	707-815-8176	dentech@rocketmail.com
Earth's Creation USA Inc	13001-C NW 38th Avenue	Opa Locka	FL	33054	305-953-9901	ecvitamins@aol.com
For Your Smiles Only, LLC	15621 Blue Ash Drive # 114	Houston	TX	77090	281-440-5023	sales@foryoursmilesonly.com
International Printers	3432 Denmark Ave, Suite 51	Eagan	MN	55123	612-619-6450	troyrone@gmail.com
Ion Labs Inc.	5459 115 Ave N	Clearwater	FL	33760	727-527-1072	sales@ionlabs.com
Nutricap Labs	70 Carolyn Boulevard	Farmingdale	NY	11735	800-494-6154	info@nutricaplabs.com

JTM-I 00006

Network Contact Info

Bloosky
9 Pasteur #100
Irvine, CA 92618
888.203.2433

Hydra
8800 Wilshire Blvd, 2nd Floor
Beverly Hills, California 90211
310-659-5755

MarketLeverage
701 International Parkway, Ste 200
Lake Mary, FL 32746
1-888-653-8372

Neverblue
Suite 201 - 1221 Broad Street
Victoria, B.C. V8W 2A4
(250) 386-5323

CX Digital
1255 Bay St. Suite 400
Toronto, ON M5R 2A9
866.962.9764

AzoogLe
512 7th Avenue, 12th Floor
New York, NY 10018
212-308-8509

Copeac (Intermark)
Suite 203, 135 Crossways Park Drive
Woodbury, NY 11797
1-877-2673221

Leadclick (eAds)
201 Spear Street, Suite 400
San Francisco, CA 94105
415-365-2900

MediaTrust (Advaliant)
404 Park Avenue South 2nd Floor
New York NY 10016
1.877.987.8785

IntegraClick (ClickBooth)
301 N Cattlemen Road, Suite 300
Sarasota, Florida 34232
941.483.4188

ROI Revolution
Suite 219, 3109 Poplarwood Ct.
Raleigh, NC 27604
919 • 954 • 5955

YEP Network
3551 blvd. St-Charles suite #322
Kirkland, Quebec, Canada, H9H 3C4
800.644.6302

SeccoSquared
1 Columbus Place suite S34F
New York, NY 10019

(646)201-5396

Network Contact Info

Float
PO BOX 11511
Zephyr Cove NV, 89448
(831) 359-7448

US returns,

? - Aug 09
PO Box 10233
Des Moines IA
50381

Aug 09 - Oct 09
PO Box 10276
Des Moines IA
50381

Oct 09 - present
22100 E. 26th Ave.#100
Aurora,CO
80019

Canada

1425 McPherson Court,
Pickering, Ontario
L1W-3H9

Australia

PO Box 4440
Milperra
BC NSW 1891

New Zealand

PO Box 210014
Laurence Stevens Drive
Manukau 2154

UK Returns

PO Box 1417,
Bedford,
MK41-5AL

JTM-I 00009

HUGHES & BENTZEN, PLLC

ATTORNEYS AT LAW
1100 CONNECTICUT AVENUE, NW
SUITE 340
WASHINGTON, DC 20036

(202) 293-8975 (202) 659-3340
FACSIMILE (202) 293-8973
www.HUGHESBENTZEN.COM

MICHAEL P. BENTZEN, P.C., DC, MD
GEORGE J. HUGHES, DC, MD
ELIZABETH HUGHES, DC, MD
PHILIP J. McNUTT, P.C., DC, MD
CHRISTOPHER WHEELER, DC, MD
JAMES A. KAMINSKI, DC, IL*

*NOT ADMITTED IN MARYLAND

February 17, 2010

OF COUNSEL
BRUCE S. DEMING, NH, DC, VA*
STUART H. SORKIN, FL, DC *

OTHER OFFICES:
ROCKVILLE, MARYLAND

CONFIDENTIAL

VIA HAND DELIVERY

Kathryn C. Decker
Federal Trade Commission
915 Second Ave., Ste. 2896
Seattle, WA 98174

Dear Casey:

As we agreed, JustThink Media ("JTM") is providing you with this supplemental response to your letter dated January 8, 2010. This submission contains summaries of the most recent transactional and inquiry data which are available. The requests addressed in this response are reprinted below in *bold italics* and followed by JTM's answers.

The information provided herein contains trade secrets and other sensitive commercial information. As such, this letter also constitutes a request for confidentiality pursuant to 15 U.S.C. §§ 46(f), 57b-2 and 16 C.F.R. §§ 4.10-4.11.

WRITTEN INTERROGATORIES

4. *Please provide the total sales for each company, broken down by month and year and by dollar amount.*

Documents that contain information responsive to this request are submitted herewith as JTM-I 00010-00014.

6. *For each year and each month since January 1, 2006, please provide for each company:*

a. *The number of sales of individual online memberships;*

15,156,135 (total number of customer transactions)

b. The dollar sales of online memberships;

\$315,123,979.20

c. The number of customers who have canceled their online membership within the applicable cancellation window;

917,485

d. The number of customers who have canceled their online membership after having been charged the monthly membership fee, but before they have purchased any product from the company's online club;

This request appears to pertain to the company's new business model in which consumers pay an annual membership fee to participate in a buyer's club. Data pertaining to these transactions are not yet available and the company will supplement this response when possible. If JTM has interpreted this request incorrectly, please provide clarification and the company will respond accordingly.

e. The number of customers who have purchased products from the company's online club;

Please see the response to Request 6(d) above.

f. The number of customers who have requested a partial or total refund of the online membership fees they paid to the company;

The company does not record this information. To the extent that the FTC narrows or otherwise clarifies this request, the company will make every effort to accommodate it.

g. The number of customers to whom the company has refunded, in whole or in part, online membership fees; and

887,596

h. The total dollars refunded to online members who requested a refund of their membership fees;

\$37,899,652.81

Confidential

- i. The total complaints received by the company from customers, online members, affiliates, suppliers and services providers (including the subject of each complaint, if that information is collected in the ordinary course of business); and*

JTM is aware that 4,212 inquiries were made to the state attorneys general and the Council of Better Business Bureaus. The company characterizes contacts made to these organizations as inquiries because they address a broad range of subjects, including but not limited to, requests for contact information about the company or routine questions about obtaining a refund.

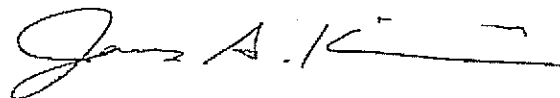
Calls to JTM's customer service line are not recorded or categorized. JTM's experience is that inquiries made to these numbers merely represent calls made in the normal course of business, including but not limited to, questions about the services JTM provides or calls regarding the trial cancellation policy.

- j. The name, address, and telephone number of those customers who sent complaints, as referred to in Request No. 6(i).*

This information is contained on the documents previously provided to the FTC and Bates labeled JTM 00001-05456.

This information is provided to the FTC voluntarily. JTM wishes to continue to cooperate with the FTC to resolve any concerns it may have. Nevertheless, JTM reserves all rights it may have to proceed in this matter. This letter does not constitute a waiver of any of those rights or an admission of any kind.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.
Klein Zelman Rothermel LLP

HUGHES & BENTZEN, PLLC

MONTH	TOTAL SALES (USD)	
ACAI		
Jan,2009	\$	9,296,558.06
Feb,2009	\$	11,131,120.24
March,2009	\$	8,835,938.09
April,2009	\$	8,155,105.13
May,2009	\$	8,227,145.15
June,2009	\$	5,077,802.25
July,2009	\$	6,993,146.56
Aug,2009	\$	7,163,530.01
Sep,2009	\$	7,525,205.96
Oct,2009	\$	9,211,367.22
Nov,2009	\$	9,239,256.02
Dec,2009	\$	8,405,306.27
Jan,2010	\$	2,393,994.60
TOTAL	\$	101,655,475.56
CRA		
Jan,2009	\$	651,079.10
Feb,2009	\$	549,565.70
March,2009	\$	644,378.40
April,2009	\$	791,457.35
May,2009	\$	767,704.65
June,2009	\$	1,127.65
July,2009	\$	370,834.34
Aug,2009	\$	203,188.60
Sep,2009	\$	10,104.43
Oct,2009	\$	13,888.14
Nov,2009	\$	1,756.92
Dec,2009	\$	2.00
TOTAL	\$	4,005,087.28
DAZZLE		
April, 2009	\$	129.15
May, 2009	\$	117,733.85
June, 2009	\$	3,008,445.30
July, 2009	\$	7,009,975.08
Aug, 2009	\$	7,553,337.31
Sep, 2009	\$	11,104,265.14
Oct, 2009	\$	16,596,114.17
Nov, 2009	\$	14,054,377.45
Dec,2009	\$	13,587,014.52
Jan,2010	\$	3,380,255.18
Total	\$	76,411,647.15
LIFTCREAM		
April, 2009	\$	436.30
May, 2009	\$	24,055.60
June, 2009	\$	94,375.41
July, 2009	\$	321,491.18
Aug, 2009	\$	254,256.29
Sep, 2009	\$	334,728.04
Oct, 2009	\$	460,621.90
Nov, 2009	\$	395,783.10
Dec,2009	\$	294,615.40
Jan,2010	\$	89,042.25
Total	\$	2,269,405.47
MakeMoney		
Jan, 2009	\$	3,001,497.15
Feb, 2009	\$	3,068,659.50
Mar, 2009	\$	2,552,540.25

JTM-I 00010

Apr, 2009	\$	1,824,061.00
May, 2009	\$	1,215,257.15
Jun, 2009	\$	22,245.60
Jul, 2009	\$	199,311.59
Aug, 2009	\$	-
Sep, 2009	\$	678,611.01
Oct, 2009	\$	3,127,865.21
Nov, 2009	\$	4,975,102.02
Dec, 2009	\$	2,487,543.56
Jan, 2010	\$	1,449,542.32
TOTAL	\$	24,602,236.36
PureCleanse	\$	-
Jan, 2009	\$	14,894.55
Feb, 2009	\$	64,839.08
Mar, 2009	\$	683,111.92
Apr, 2009	\$	1,406,298.36
May, 2009	\$	1,048,225.48
Jun, 2009	\$	893,320.84
Jul, 2009	\$	599,629.29
Aug, 2009	\$	581,917.22
Sep, 2009	\$	875,587.44
Oct, 2009	\$	1,090,167.20
Nov, 2009	\$	1,180,722.39
Dec, 2009	\$	711,630.01
Jan, 2010	\$	248,684.05
TOTAL	\$	9,399,027.83
ResV	\$	-
Mar, 2009	\$	253.05
Apr, 2009	\$	912.70
May, 2009	\$	4,240.55
June, 2009	\$	8,709.80
July, 2009	\$	38,413.96
Aug, 2009	\$	191,356.68
Sep, 2009	\$	230,098.76
Oct, 2009	\$	370,825.64
Nov, 2009	\$	235,003.31
Dec, 2009	\$	128,560.02
Jan, 2010	\$	48,891.84
TOTAL	\$	1,257,266.31
VibrantSmileKit	\$	-
Dec, 2009	\$	145.00
Jan, 2010	\$	1,370,479.28
TOTAL	\$	1,370,624.28
Wu-Yi	\$	-
Jan, 2009	\$	6,541,449.32
Feb, 2009	\$	4,690,096.14
Mar, 2009	\$	3,512,125.16
Apr, 2009	\$	2,065,464.92
May, 2009	\$	1,708,032.84
Jun, 2009	\$	721,761.04
Jul, 2009	\$	2,864.45
Aug, 2009	\$	-
Sep, 2009	\$	-
Oct, 2009	\$	-
Nov, 2009	\$	-
Dec, 2009	\$	9.90
IProfit Kit	\$	-
Aug, 2009	\$	-

JTM-I 00011

Sep,2009	\$	-
Oct,2009	\$	50.84
Nov,2009	\$	445,079.08
Dec,2009	\$	237,334.89
Jan,2010	\$	262,115.41
Total	\$	944,580.22
MouthTray		
Aug,2009	\$	-
Sep,2009	\$	1,483,743.60
Oct,2009	\$	1,066,602.76
Nov,2009	\$	1,908,625.70
Dec,2009	\$	1,250,162.23
Jan,2010	\$	371,354.22
Total	\$	6,080,488.51
PureCleanse Pro		
Aug,2009	\$	-
Sep,2009	\$	636,449.20
Oct,2009	\$	918,815.44
Nov,2009	\$	1,151,729.95
Dec,2009	\$	727,875.84
Jan,2010	\$	278,388.91
Total	\$	3,713,259.34
ComprehensiveWeightLoss		
Jan, 2009	\$	2,269,943.25
Feb, 2009	\$	2,901,002.10
Mar, 2009	\$	2,968,642.20
Apr, 2009	\$	2,736,220.15
May, 2009	\$	2,841,182.70
Jun, 2009	\$	1,995,120.85
Jul, 2009	\$	1,383,125.10
Aug, 2009	\$	2,602,202.73
Sep, 2009	\$	2,550,735.16
Oct, 2009	\$	1,937,854.55
Nov, 2009	\$	1,408,822.59
Dec, 2009	\$	1,095,917.55
Jan, 2010	\$	733,165.84
Total	\$	27,423,934.77
FraudProtection Resources		
Jan, 2009	\$	713,448.45
Feb, 2009	\$	934,712.50
Mar, 2009	\$	793,918.95
Apr, 2009	\$	710,154.25
May, 2009	\$	628,825.00
Jun, 2009	\$	16,701.25
Jul, 2009	\$	-
Aug, 2009	\$	-
Sep, 2009	\$	-
Oct, 2009	\$	-
Nov, 2009	\$	-
Dec, 2009	\$	-
Jan, 2010	\$	-

JTM-I 00012

Total	\$	3,797,760.40
ID Theft Protection		
Jan, 2009	\$	1,088,510.10
Feb, 2009	\$	1,649,341.85
Mar, 2009	\$	1,346,055.90
Apr, 2009	\$	1,142,339.60
May, 2009	\$	983,458.00
Jun, 2009	\$	25,720.75
Jul, 2009	\$	-
Aug, 2009	\$	-
Sep, 2009	\$	-
Oct, 2009	\$	-
Nov, 2009	\$	-
Dec, 2009	\$	-
Jan, 2010	\$	-
Total	\$	6,235,426.20
ID Vault		
Sep, 2009	\$	-
Oct, 2009	\$	548,770.20
Nov, 2009	\$	718,912.52
Dec, 2009	\$	437,080.45
Jan, 2010	\$	181,437.82
Total	\$	1,886,200.99
InsiderSecrets		
Jan, 2009	\$	1,540,152.90
Feb, 2009	\$	1,594,518.75
Mar, 2009	\$	1,828,650.15
Apr, 2009	\$	1,917,322.60
May, 2009	\$	1,826,115.80
Jun, 2009	\$	1,073,948.95
Jul, 2009	\$	728,241.84
Aug, 2009	\$	1,449,182.03
Sep, 2009	\$	1,301,697.75
Oct, 2009	\$	997,219.23
Nov, 2009	\$	688,512.32
Dec, 2009	\$	514,035.51
Jan, 2010	\$	335,826.67
Total	\$	15,795,424.50
WorldClub Fitness		
Sep, 2009	\$	-
Oct, 2009	\$	196,946.34
Nov, 2009	\$	2,665,134.58
Dec, 2009	\$	4,279,476.61
Jan, 2010	\$	1,556,182.80
Total	\$	8,697,740.33
Weightloss Resource Management		

JTM-I 00013

Sep,2009	\$	-
Oct,2009	\$	45,603.56
Nov,2009	\$	137,987.06
Dec,2009	\$	89,904.26
Jan,2010	\$	63,095.00
Total	\$	<u>336,589.88</u>

JTM-I 00014

HUGHES & BENTZEN, PLLC

ATTORNEYS AT LAW
1100 CONNECTICUT AVENUE, NW
SUITE 340
WASHINGTON, DC 20036

(202) 293-8975 (202) 659-3340
FACSIMILE (202) 293-8973
WWW.HUGHESBENTZEN.COM

MICHAEL P. BENTZEN, P.C., DC, MD
GEORGE J. HUGHES, DC, MD
ELIZABETH HUGHES, DC, MD
PHILIP J. McNUTT, P.C., DC, MD
CHRISTOPHER WHEELER, DC, MD
JAMES A. KAMINSKI, DC, IL*

*NOT ADMITTED IN MARYLAND

OF COUNSEL
BRUCE S. DEMING, DC, VA*
STUART H. SORKIN, FL, DC*

OTHER OFFICES:
ROCKVILLE, MARYLAND

March 5, 2010

CONFIDENTIAL

Kathryn C. Decker
Federal Trade Commission
915 Second Ave., Ste. 2896
Seattle, WA 98174

Dear Casey:

Enclosed please find a supplemental response of JustThink Media ("JTM") to your letter dated January 8, 2010. The information contained herein primarily pertains to the years prior to 2009. As we agreed, JTM will respond to your additional requests (dated February 19 and 26, 2010) on March 12 and 19, 2010, respectively.

On a preliminary note, JTM reiterates that it continues to invest much manpower to provide the FTC with the requested information to resolve any concerns you may have. On March 1, 2010, you requested additional information in an email message. Namely, you identified several additional web sites and requested information about them.

Although JTM will provide full details and clarifications in the later-scheduled productions, the web sites which you reference are in fact referred to as "merchant websites." These are sites required by the banks in order to process funds. They are apparently not advertised and essentially do not process any transactions.

Please also be aware that to provide the information about the web sites and other creatives to you, JTM searched all company computers for existing relevant files. It is very likely that this type of search resulted in substantially more material than what in fact was ever set live and displayed to customers. This occurred because there are several levels of review before copy is disseminated. It is highly likely that earlier drafts were contained on the computers. Nevertheless, JTM wishes to be over inclusive in its production to the FTC. If JTM learns that it has not provided something that is relevant, it will supplement its submissions.

You also inquired as to the existence of an entity named JDWMT Media, Inc. JTM is not affiliated with that entity and has no knowledge as to its business practices.

The information provided herein contains trade secrets and other sensitive commercial information. As such, this letter constitutes a request for confidentiality pursuant to 15 U.S.C. §§ 46(f), 57b-2 and 16 C.F.R. §§ 4.10-4.11.

WRITTEN INTERROGATORIES

1. *Please state the correct legal name and address of each of you¹ companies and any dbas, the date and state/province of incorporation, where applicable; and the correct legal name(s) and address(es) of all parent, subsidiary or affiliated businesses or companies, including any joint ventures. Explain the nature of the relationship between each parent, subsidiary, affiliated business or company, or any joint venture, including any overlapping officers, directors, and/or owners. State the names of all officers and directors of each company and, if it is a privately-held corporation, state the names and percentages of ownership of all stockholders in each company.*

Information responsive to this request is submitted herewith on JTM-CD 00002.

2. *Please list the states/provinces in which each of your companies is licensed to do business or in which each conducts or has conducted business since January 1, 2006. Provide a copy of each business license, registration or permit issued to each company by any state/provincial or local government entity.*

JTM is gathering this information and will include it in a supplemental submission.

3. *Please provide the name and job title of each manager and employee of each company and describe each such person's duties within that company.*

JTM provided this information to the FTC in a prior submission. JTM will provide the additional information you requested in a supplemental response.

¹ "Your" and "You" includes Jesse Willms and all companies he owns and operates, directly or indirectly.

Confidential

4. *Please provide the total sales for each company, broken down by month and year and by dollar amount.*

Information responsive to this request is submitted herewith on JTM-CD 00002.

5. *Please list all of the products promoted, marketed, or sold by each of your companies.*

Information responsive to this request is submitted herewith on JTM-CD 00002.

6. *For each year and each month since January 1, 2006, please provide for each company:*

- a. The number of sales of individual online memberships;*
- b. The dollar sales of online memberships;*
- c. The number of customers who have canceled their online membership within the applicable cancellation window;*
- d. The number of customers who have canceled their online membership after having been charged the monthly membership fee, but before they have purchased any product from the company's online club;*
- e. The number of customers who have purchased products from the company's online club;*
- f. The number of customers who have requested a partial or total refund of the online membership fees they paid to the company;*
- g. The number of customers to whom the company has refunded, in whole or in part, online membership fees; and*
- h. The total dollars refunded to online members who requested a refund of their membership fees;*
- i. The total complaints received by the company from customers, online members, affiliates, suppliers and services providers (including the subject of each complaint, if that information is collected in the ordinary course of business); and*
- j. The name, address, and telephone number of those customers who sent complaints, as referred to in Request No. 6(i).*

Information responsive to this request is submitted herewith on JTM-CD 00002.

7. *Please describe all media used to promote, market, or sell each of your products. For products promoted, marketed, or sold via the internet, provide the following information for each website:*

- a. The website address;*
- b. The web host for the website;*

HUGHES & BENTZEN, PLLC

- c. The time period during which the website was running; and*
- d. The product(s) offered on that website.*

Information responsive to this request is submitted herewith on JTM-CD 00002.

8. *Please provide the name, address, and telephone numbers of each person or entity who participates or has participated in the development of the websites referred to in Request No. 7, including the content contained in the websites, together with a description of the participation by each such person or entity.*

Bart Calendar
Calendar Communications
Copywriting
42 Rue Alexandre Cabanel
Montpellier
France, 32000
Tel: (011)-3-395-285-5562

Nethues Technologies Pvt., Ltd
4th Floor
N N Mall
Manglam Palace , Delhi 110085
India
Tel: (91)-11-47567702

9. *Please provide the name, address, and telephone number of each person or entity who is or has been responsible for fulfilling consumers' orders for products promoted, marketed, or sold by you.*

Documents that contain information responsive to this request are submitted herewith on JTM-CD 00002.

10. *Please provide the name, address, and telephone number of each person or entity who is or has been responsible for handling customer service issues and customer complaints regarding products promoted, marketed, or sold by you.*

Just Think Media
Nolan Paquette,
Reid Hosford, Quality Control Manager
Mark Adamson, Public Relations
Susan Roy, Office Manager

Confidential

Suite 204, 85 Cranford Way
Sherwood Park, Alberta, Canada
T8H 0H9

(780) 416-0244

Live Ops, Inc.
Burt Lampl
Derek Mina

5425 Stevens Creek Blvd.
Santa Clara, CA 95051

11. *Please provide the name, address, and telephone number of any third party supplier of products promoted, marketed, or sold by you.*

Information responsive to this request is submitted herewith on JTM-CD 00002.

12. *Please provide the name, address, and telephone number of all advertising networks that you or your companies have retained for provision of services.*

This information was provided to the FTC as JTM-I 00007-00008.

13. *Please provide the name, address, and telephone number of all affiliate marketing companies who have promoted, marketed, or sold on your behalf. For each affiliate marketer, identify the names of the product(s) it promoted, marketed, or sold, and the time period during which the product(s) was promoted, marketed, sold.*

ROI Revolution
3109 Poplarwood Ct., Suite 219
Raleigh, NC 27604
Tel: (919) 954-5955.

14. *Please list all enforcement actions and law suits brought against you related to the promoting, marketing, or sale of any product sold including, but not limited to, online memberships.*

Okuma Nutritionals, LLC v. eDirect Software, Case No. 1:07-cv-02010-EWN-BNB (D. Colo. 1997).

HUGHES & BENTZEN, PLLC

15. Please provide the address of each post office box and private mail receiving agency in the United States, Canada, or elsewhere that you use or have used, and the time period during which each address was used.

This information was provided to the FTC as JTM-I 00009.

16. Please state whether you use consumers' responses to your websites for the purpose of compiling direct marketing lists. If you do compile direct marketing lists from consumers' responses to your websites, state precisely what information you collect from those responses and what information you make available for sale or rent to third parties.

JTM represents in good faith that it does not compile lists for direct marketing purposes, although it is permitted to do so under the privacy policies posted on the web sites at issue. JTM will amend its response if it becomes aware of any instance where such marketing occurred.

DOCUMENTARY MATERIALS

17. A copy of each organization chart and personnel directory in effect since January 1, 2006, for each of your companies as a whole.

Information responsive to this request is submitted herewith on JTM-CD 00002.

18. Copies of all disseminated advertisements or promotional materials including, but not limited to, internet advertisements, websites, print ads, radio ads, television ads, and recorded messages, referring or relating to each company's online club or other products sold, marketed or distributed by or through the company.

Documents that contain information responsive to this request are submitted herewith on JTM-CD 00002.

19. For each website identified in response to Request No. 21, provide a complete printout of the entire site, as well as an electronic copy of the entire website. Please refer to the instructions regarding submission of magnetic media.

Documents that contain information responsive to this request are submitted herewith on JTM-CD 00002.

20. All documents relating to your decision to make membership in your online clubs subject to a "negative option" or "continuity plan."

JTM did not identify any documents responsive to this request.

21. *Copies of all documents prepared by you, or by any other person or entity on your behalf, relating or referring to data or analyses of consumer perception, comprehension or recall (including, but not limited to, copy tests, marketing or consumer surveys, penetration tests, marketing recall tests, audience reaction tests, and communication tests) of any websites used in the marketing of all products. Also provide copies of any other market research or media or copy strategies prepared by you, or by any other person or entity on your behalf, regarding consumer attitudes or beliefs about negative option programs or continuity plans.*

JTM will respond to this request with relevant documents in its possession in its supplemental submissions. To the extent that this request seeks production of documents which were prepared by and/or for counsel, such documents are excluded from this submission by the attorney-client privilege and/or work-product immunity from disclosure.

22. *Copies of all documents or communications (whether electronic, written or written recordings of oral communications) between you and any government agency including, but not limited to, the state/provincial attorneys general, as well as between you and any private consumer protection organization including, but not limited to, the Better Business Bureau, that refer or relate to products sold on the internet, including complaints and refund requests.*

JTM has no additional documents responsive to this request other than those produced as JTM 00001-05456.

23. *Copies of all documents or communications (whether electronic, written or written recordings of oral communications) between you and any consumer that refer or relate to products sold on the internet, including all complaints and refund requests.*

JTM has no additional documents responsive to this request other than those produced as JTM 00001-05456.

24. *All recordings made by or on behalf of each company of conversations or communications of any kind between the company and any purchaser or potential purchaser of the company's online membership.*

JTM is currently working with two outside call centers. One call center informed JTM that it does not retain recordings of calls. The other call center retains such recordings for only ninety (90) days. The recordings are voluminous and it is extremely time-consuming to download them. Therefore to respond in a meaningful way to your request, JTM requested the call center to collect a random sample for your review. Those recordings are contained on JTM-CD 00002.

25. *Copies of all contracts or agreements between you and your suppliers, affiliates or service providers including, but not limited to, entities responsible for: providing the products sold to customers, handling fulfillment of customer orders, customer service, customer complaints, and providing of websites or arranging for the providing of websites.*

Documents that contain information responsive to this request are submitted herewith as JTM 05457-05486.

26. *Copies of all contracts or agreements between you and any person or entity that provides, or has provided, you with advertising services or arranged for the provision of advertising services including, but not limited to, creation, development, reviewing, testing, evaluating, approval, production, and dissemination of advertisements.*

Documents that contain information responsive to this request are submitted herewith as JTM 05487-05646.

27. *Copies of all documents, notes, memoranda, or communications (whether written or written memorializations of oral communications, or e-mail) between you and any person or entity referred to in Request No. 26 that refer or relate to the provision of advertising services or any proposed or disseminated advertisement.*

Documents that contain information responsive to this request are submitted herewith as JTM 05647-10148. Please be advised that the documents frequently contain attachments which are not provided. JTM will provide you with any attachments you request.

28. *Copies of all records and documents identifying employees who have been reprimanded, sanctioned, or had their employment terminated for any reason.*

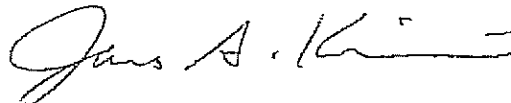
JTM believes in good faith that it is not permitted to divulge this information to the FTC pursuant to the Province of Alberta's Personal Information Protection Act (PIPA). It will work with the FTC to provide any general information regarding this subject that the FTC requests.

Kathryn C. Decker
March 5, 2010
Page 9 of 9

Confidential

This information is provided to the FTC voluntarily. JTM reserves all rights it may have to proceed in this matter. This letter does not constitute a waiver of any of those rights or an admission of any kind.

Sincerely,

A handwritten signature in cursive script, appearing to read "James A. Kaminski".

James A. Kaminski

cc: Sean Moynihan, Esq.
Klein Zelman Rothermel LLP

HUGHES & BENTZEN, PLLC

HUGHES & BENTZEN, PLLC

ATTORNEYS AT LAW
1100 CONNECTICUT AVENUE, NW
SUITE 340
WASHINGTON, DC 20036

(202) 293-8975 (202) 659-3340
FACSIMILE (202) 293-8973
WWW.HUGHESBENTZEN.COM

MICHAEL P. BENTZEN, P.C., DC, MD
GEORGE J. HUGHES, DC, MD
ELIZABETH HUGHES, DC, MD
JAMES A. KAMINSKI, DC, IL*
PHILIP J. McNUTT, P.C., DC, MD
STUART H. SORKIN, P.C., FL, DC *
CHRISTOPHER WHEELER, DC, MD

March 12, 2010

OF COUNSEL
BRUCE S. DEMING, NH, DC, VA*

OTHER OFFICES:
ROCKVILLE, MARYLAND

*NOT ADMITTED IN MARYLAND

CONFIDENTIAL

Kathryn C. Decker
Federal Trade Commission
915 Second Ave., Suite 2896
Seattle, WA 98174

Dear Casey:

Enclosed please find the response of JustThink Media ("JTM") to your letter dated February 19, 2010. First, please allow us to address the concerns that you raised in a subsequent letter dated March 10, 2010. Specifically, you requested that JTM instruct its call center vendors to retain all recordings that pertain to customer service calls. The company conducted an internal investigation on this issue. It determined that one call center had a seven-day retention policy. That center handled calls that pertained to the digital products. There were little or no calls received for those products as JTM paused the campaign in deference to the FTC. The second center that accepts calls pertaining to the other products has the retention policy in place. To the extent that this information contradicts any representations made to you in prior submissions, please consider this the correct information. As such, it constitutes a clarification made in good faith.

JTM appreciates the opportunity to cooperate with the FTC. If you have any additional concerns, JTM requests that you continue to transmit those questions to counsel so that they can be properly and expeditiously addressed.

The information provided herein contains trade secrets and other sensitive commercial information. As such, this letter constitutes a request for confidentiality pursuant to 15 U.S.C. §§ 46(f), 57b-2 and 16 C.F.R. §§ 4.10-4.11.

Your requests for clarification are reprinted below in bold italics and followed by JTM's response.

1. ***Post trial cancellations. Specification 6 (d) or (e) was intended to obtain information regarding customers who cancelled after the expiration of the trial period and thus had been charged the monthly fee. Please break this information down by product and online service offered and by month. For example, please state how many people cancelled one, two or three months after the expiration date.***

This information was provided to you as part of the March 5, 2010 submission. It is contained on JTM-CD 00002 in response to Request #6. JTM does not maintain the data in a manner that would permit it to discern in which particular month the cancellation requests were registered.

2. ***Purchases under new business model. Specification 6(e) requests the number of customers who purchased products from the company after the trial period expired. Again, we would like this information broken down for each product and online service sold, as well as by year and month since the new business model began.***

The new business model was implemented in early 2010. There were no sales made under it in 2009. As such, JTM has not compiled any data relating to it. JTM expects to have such data in the upcoming months. Once the data is available, JTM will voluntarily transmit it to the FTC.

3. ***Refunds. Specification 6(g) and (h) ask that you provide the number of consumers and dollars refunded, in whole and part, for online membership fees. Please state whether these refund numbers include consumers who received credits on their debit and credit cards. If not, please provide information regarding the total number of customers who received credits on their debit or credit cards, in whole or in part, for the online membership fees, and the total dollars credited to customers' debit and credit cards for the online membership fees.***

JTM provided 887,596 refunds in 2009 that amounted to \$37,899,652.81. Consumers received their refunds on the payment cards used to purchase the products. If there was a problem with issuing a credit in that manner (for example if the card was expired), JTM issued a check.

CONFIDENTIAL

4. *2009 statistics. You stated at our meeting that 25-50% of your clients' 2009 customers have not cancelled their online membership. For each product and online service sold in 2009, please provide:*
- a. *The number of consumers who cancelled within the allowable time period;*
 - b. *The allowable cancellation time period for each product;*
 - c. *The number of consumers who cancelled after being charged for one month's membership;*
 - d. *The number of consumers who cancelled after being charged for two months' membership;*
 - e. *The number of consumers who cancelled after being charged for three months' membership; and*
 - f. *The number of consumers who have not cancelled their online membership.*

This information was provided to you as part of the March 5, 2010 submission. It is contained on JTM-CD 00002 in response to Request #6. JTM does not maintain the data in a manner that would permit it to discern in which particular month the cancellation requests were registered.

5. *Customer calls. Specification 24 asks for recordings made by your company (or made on their behalf) of calls between customers or prospective customers and your company. You told us at our meeting that only calls made by customers to your customer service agents post-sale are tape recorded. You also stated that there are no calls from your company to the customer immediately following the customer's purchase of the trial offer, but instead your clients send an email to the customer verifying their order. In addition to our initial request in Specification 24, you have agreed to provide us with information and documents on the retention policy regarding the tape recordings of the post-sale calls between customers and your customer service agents.» Please also provide us with the total number of telephone calls customers made to your customer service agents, broken down by year (2007 to the present), and any documents discussing or analyzing these customer communications.*

JTM employs two call centers to address customer service issues. One call center had a seven-day retention policy. That center handled calls that pertained to the digital products. There were no calls received for those products as JTM paused the campaign in deference to the FTC. The second center that accepts calls pertaining to the other products has the retention policy in place.

To clarify its earlier responses, JTM initiated an exploratory outbound call program to confirm customers' purchases. This program began in mid-August 2009 and

HUGHES & BENTZEN, PLLC

continued through November 2009. The purpose of the calls was to ensure that the customer did indeed order the product. For a brief two-month period, one additional product was offered during those follow-up calls. JTM determined that the program was not adding any value to customer satisfaction and terminated the program. To the extent that this information contradicts any representations made to you in prior submissions, please consider this the correct information. As such, it constitutes a clarification made in good faith.

6. *Live Chat sessions. You agreed at our meeting to provide us with information and documents on the retention policy regarding the electronic files of Live Chat sessions consumers have on your clients' websites pre- and post-sale. In addition, please provide us with the total number of Live Chat sessions between customers and your company, broken down by year (2007 to the present), any documents discussing or analyzing these customer communications, and copies of electronic files of the Live Chat sessions.*

JTM reports that the chat volume has been extremely low. Upon the FTC's request, JTM instructed the vendor to maintain copies of the chats and it is now doing so. Once such records are amassed, JTM will voluntarily transmit them to the FTC.

7. *FAQs. In the materials you provided us at our meeting (hereafter referred to as "2/17/10 presentation"), you provided us with a webshot of the AcaiBum Main Page (p. 8). A box appeared on that page entitled "Frequently Asked Questions." The answers to those questions, which appear as popups, were not shown. Please provide us with webshot(s) that consumers see when they click on each of the six Frequently Asked Questions.*

A document that contains information responsive to this request is submitted herewith as JTM-I 00015.

8. *Random usage sample. In the 2/17/10 presentation, there is mention of a random sample of 166 visitors to the Acaiburn website and the analysis of their usage data (p. 13). You stated that this random sample had been done in-house. Please provide us with detailed information and complete documentation regarding this in-house sample including, but not limited to:*
 - a. *when the random sample was done;*
 - b. *the names and addresses of the person(s) who designed the random sample;*
 - c. *the names and addresses of those who conducted the random sample;*
 - d. *the names and addresses of those who analyzed the data from the random sample;*

CONFIDENTIAL

- e. *a detailed description of what the heat map purports to measure, e.g., where the consumer's cursor is on the page versus where the consumer's eyes are on the page; and*
- f. *a copy of any report or memorandum that discusses the sample, the methodology used, and its findings.*

JTM reports that the heat map test was conducted sometime in early 2009. The test was designed, conducted, and analyzed by Jesse Willms, with assistance from Szymon Kiedyk using the Clicktale service at <http://www.clicktale.com>. The heat map tracks the screen visibility of users on the website. As users scroll and pause through the page, the heat map system will track the amount of time that a particular horizontal section of the site is visible on a users' screen. The heat map makes no indication as to where the user is currently looking or where their mouse is. JTM does not possess any reports or memorandums in relation to this heat map test. Additional documents responsive to this request are submitted herewith as JTM-I 00016-00021.

9. *Readability studies. In response to Specifications 18,19, and 21, you provided a disk labeled JIM CD 00001. Much of the data contained on the disk is your clients' websites.*

A number of the websites include a page entitled "Advertising Policies." The section headed "Readability studies" states:

"We have commissioned an independent study to review how the public reads our ads. These focus groups are designed to help us find out where and how to place our terms and conditions, disclaimers, legal notices, and such on our site in a way where it will actually be read by consumers before they make a purchase." (See, e.g., Willms's Response, JTM CD 00001, Item 019, 7/1/09-9/30/09, Acai Slim Detox, Advertising Policies)

Please provide us with detailed information and complete documentation regarding this in-house sample including, but not limited to:

- a. *when the independent study was done;*
- b. *the names and addresses of the person(s) who designed the independent study,*
- c. *the names and addresses of those who conducted the independent study,*
- d. *the names and addresses of those who analyzed the data from the independent study; and*
- e. *a copy of any report or memorandum that discusses the independent study, the methodology used, and its findings.*

HUGHES & BENTZEN, PLLC

The information provided in response to Supplemental Request # 8 above is responsive to this request. To the extent that this request seeks production of documents which were prepared by and/or for counsel, such documents are excluded from this submission by the attorney-client privilege and/or work-product immunity from disclosure.

10. *Package insert. In the 2/17/10 presentation, there is an AcaiBurn insert that suggests it is not the insert from the trial sample package, but rather a secondary purchase. It states, "I hope you have enjoyed your trial offer of AcaiBurn. I want to congratulate you on deciding to continue to use AcaiBurn." (p. 14). Please provide us with the insert that is sent with the trial sample or confirm that the insert in the 2/17/10 presentation is the one sent with every AcaiBurn package.*

Documents responsive to this request are submitted herewith as JTM-I 00022-00026.

11. *Login Statistics. In the 2/17/10 presentation, there is a chart showing that 79% of their customers used (i.e. logged onto) the additional membership resources (p. 16). For each product's website, please provide information and documents that shows:*
- a. The number of people who logged onto the site one time;*
 - b. The number of people who logged onto the site two times;*
 - c. The number of people who logged onto the site more than two times; and*
 - d. The average length of time consumers spent on the site at each visit.*

JTM does not maintain this data in a manner that would allow it to discern the number of times a user has accessed the sites after the initial log-in.

12. *Shipping method. There was discussion about how the products, particularly the trial samples, are sent to consumers. Please state:*
- a. what method of delivery is used to ship the trial samples;*
 - b. how soon the product is shipped after receiving an order;*
 - c. whether a tracking system is used; and*
 - d. the average length of time it takes for products to be delivered to consumers.*

Information responsive to this request is contained on JTM-I 00027.

CONFIDENTIAL

13. *Cancellation terms. There is some question about whether consumers must return the trial sample in order to cancel their membership within the trial period. Please confirm what conditions must be met for consumers to cancel during the trial period. If the trial sample must be returned in order to cancel, does it have to arrive back at the company (or fulfillment house) within the allowable cancellation time period? Please state whether this policy applies to all products and whether this policy has changed since 2007.*

Consumers are currently not required to return the product if they cancel within the trial period. This policy was implemented in February 2010. Prior to that date, consumers were required to return the product within the trial period. As part of its return policy, JTM provided consumers with an additional 7-day shipping margin. In other words, consumers received an additional 7 days to return the products, effectively extending the trial period to 21 days. This policy was in place for approximately 90% of all JTM sales.

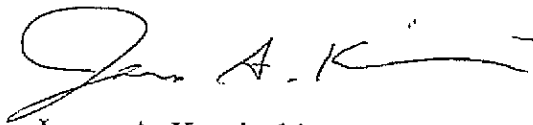
In addition, consumers who were not satisfied with the product and wished to receive a refund for their product after the trial period expired were eligible for a full refund under the 60-day money back guarantee. The money back guarantee remains in place.

14. *Income statements. During our meeting, you agreed to provide us with the 2009 income statements (which may be unaudited this time), as well as audited income statements from the prior years of operation.*

JTM is continuing to gather these documents. It will submit them in the March 19, 2010 submission to you.

This information is provided to the FTC voluntarily. JTM reserves all rights it may have to proceed in this matter. This letter does not constitute a waiver of any of those rights or an admission of any kind.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.
Klein Zelman Rothermel LLP

HUGHES & BENITZEN, PLLC

AcaiBurn.com Frequently Asked Questions

Are The Testimonials Real?

Yes! Each and every testimonial used on the AcaiBurn site was sent to us by satisfied customers. They contacted us because they love how great their new body looks!

When Will I Receive My Package?

Your package of AcaiBurn will be sent to you as soon as we confirm your billing information. That means that if you live in the continental United States, you should get your package in three to five days. If you live outside the U.S., you should get your package in two weeks or less.

What If It Doesn't Work?

We believe that AcaiBurn will provide you with the results you are looking for. But, if you are not satisfied for any reason, you are covered by our 30-day guarantee. Simply send us your unused portion and we will refund your money.

How Do I Contact You If I Need Assistance?

You have two great options to contact us if you need help. First, you can use our 24/7 Live Chat service. Or, you can call (insert phone number) during regular business hours, and our trained customer service staff will be glad to help you.

Will I be billed if I decide to keep my trials?

When you first place your trial order you will be charged \$xx which will cover your shipping and handling charges. Then, after 14 days we will send you a new supply and bill your credit card the regular monthly fee of \$xx. To make it as easy for you as possible we will continue to ship you new supplies and bill your card every month from then on unless you cancel. Should you decide that our product is not for you simply contact us at xxx xxx xxxx and one of our representatives will be glad to help you.

How Can I Be Sure My Information Is Safe And Secure?

We use state of the art 128-bit encryption technology to make sure your transaction is as safe as possible. Of course, this is only as secure as the computer you are using. We suggest you keep your firewall and anti-virus software up to date so you have the highest level of protection.

JTM-I 00015

Scroll Reach Heatmaps

Customer activity tracking with ClickTale.com

JTM-I 00016

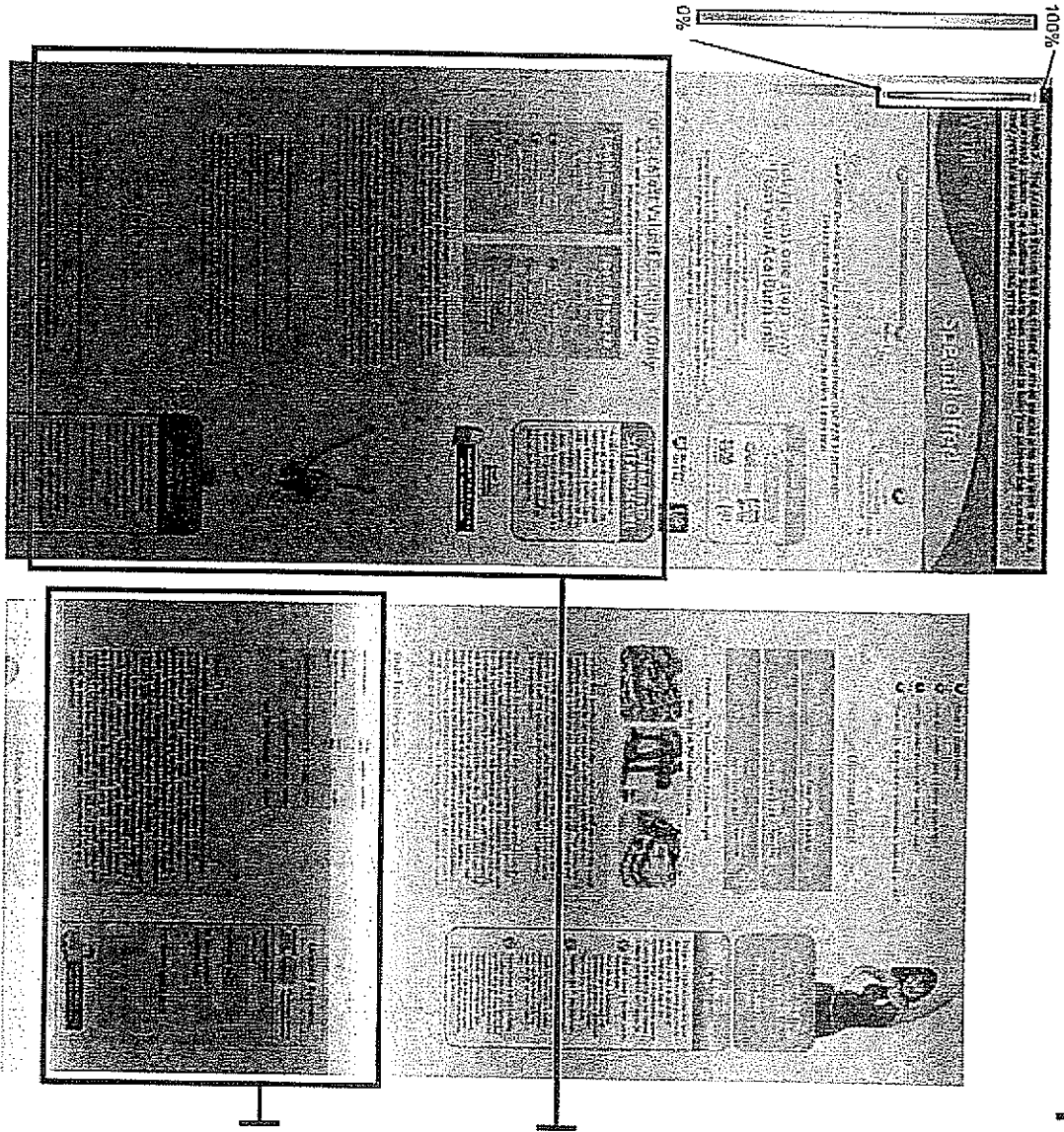
Product Website Heatmaps

The heat map pictured to the left tracks visitors to our website and records how long visitors spend on each area of the page. This data is translated into varying levels of color to show the relative amount of time spent at each particular section.

Areas of least attention have a darker blue color to indicate a lower percentage of attention out of 100%.

Areas of very high attention have a yellow and bright red color to indicate a much higher percentage of attention out of 100%.

An average of 1 minute and 10 seconds to 1 minute and 20 seconds has been recorded in this area of JustThink Media sites that clearly presents the terms and conditions of our offers.



JTM-I 00017

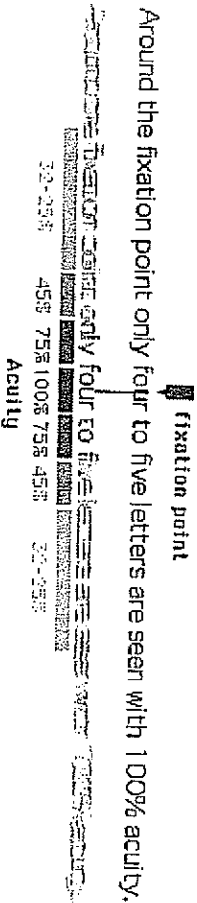
Reading Rates and Comprehension

JTM-I 00018

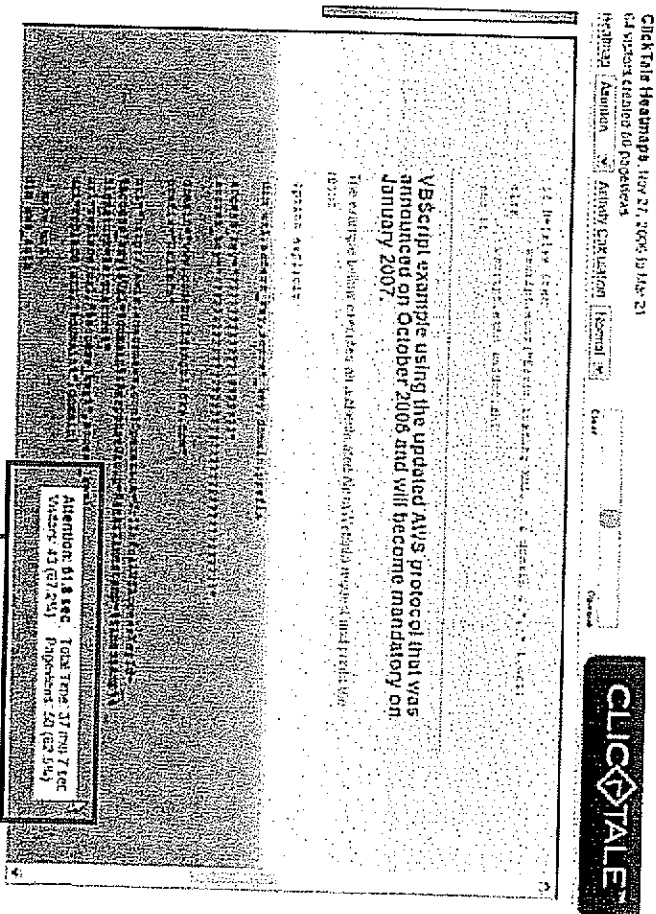
Given that JustThink Offer Details rarely exceed more than 200 words, it will take the average adult less than a minute to read and fully comprehend all important information pertaining to JustThink Media products prior to purchasing.

While proofreading materials, people are able to read at 200 wpm on paper, and 180 wpm on a monitor.

Source: Ziefle, M. (1998), *Effects of display resolution on visual performance, Human Factors*, 40(4), 555-568



Around the fixation point only four to five letters are seen with 100% acuity.



Details of time spent in each area is outlined and color coded in the ClickTale attention tracking heatmaps.

<http://blog.clicktale.com/2007/04/03/clicktale-heatmaps/>

Scroll Reach Heatmaps by ClickTale.com

In this post, we will demonstrate the ClickTale scroll reach data and behavioral patterns related to scrolling behavior.

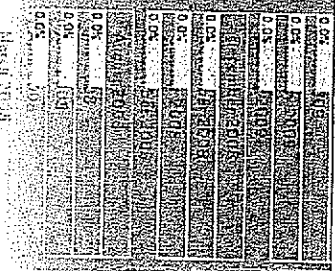
The Data

As always, this research is based on data that we collected with our service (ClickTale). We used a subset of about 120,000 page-views dated November 2006 to December 2006. In this research, we will be analyzing only vertical scrolling behavior. The service records the height of the web pages, the height of the window and the bottom-most location the user scrolled to.

Global Statistics

- 91% of the page-views had a scroll-bar.
- 76% of the page-views with a scroll-bar, were scrolled to some extent.
- 22% of the page-views with a scroll-bar, were scrolled all the way to the bottom.

These statistics demonstrate that the vast majority of web page users scrolled to some extent, and that the majority of users scrolled all the way to the bottom. While 22% may seem low, at first, it is actually quite high as many



Heat maps used to track user activity for JustThink Media product websites are by ClickTale.com.

ClickTale is an industry leader in Customer Experience Analysis (CEA), they provide insight to businesses on their customers online behavior. Founded in 2006 ClickTale has won much acclaim for its reliability and innovation in the area of CEA.

More than 35,000 businesses rely on ClickTale to optimize their website usability and performance.

Source: http://www.clicktale.com/product/scroll_reach_heatmaps

ClickTale as a Web Development Tool



ClickTale has won much acclaim worldwide with their innovative user activity tracking systems such as Attention, Scroll Reach, and Click Heatmaps. As a world leader in Customer Experience Analytics (CEA) they have garnered much attention from numerous reputable media outlets.

JTM-I 00020

Entrepreneur

Silverpop and ClickTale Provide Clients with New Insights Into Customer Behavior

ClickTale is the industry leader in Customer Experience Analytics (CEA), providing businesses with revolutionary insights into their customers' online behavior. Over 35,000 businesses rely on ClickTale to optimize website performance, improve usability and dramatically increase conversion rates. ClickTale tracks every mouse move, click and scroll, creating playable videos of customers' entire browsing sessions as well as powerful visual heatmaps and behavioral reports that perfectly complement traditional web analytics.

Source: <http://www.entrepreneur.com/pnewswire/release/243595.html>

ClickTale as a Web Development Tool Cont.

Mashable

The Social Media Guide

ClickTale Launches Link Analytics: How Hot is Your Site?

...these are very different metrics from those you tend to get in the standard stat packages. But maybe they need to be: there are so many companies offering web stats these days, while the popular Google Analytics (Google Analytics) already provides very basic heatmaps, albeit without the new stuff introduced by the startups.

Source: <http://mashable.com/2007/08/05/clicktale-link-analytics/>

VentureBeat

ClickTale Overview

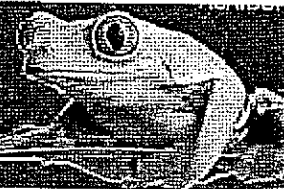
ClickTale delivers innovative In-Page Web Analytics that reveal the mystery of what visitors actually do inside website pages, allowing you to analyze and optimize website performance and usability. Our unique solution provides movies of your visitors' actual browsing sessions, heatmaps of aggregate behavior inside the web page, and advanced behavioral analytics.

Source: <http://venturebeatprofiles.com/company/profile/clicktale>

JTM-I 00021

AcaiBurn

The Secret Of The Amazon



Dear Friend,

Firstly, let me congratulate you on investing in this tested and proven Acai-Burn and weight loss program. Believe me, over the years I've met hundreds of people who want to lose weight, but I meet far less whom, like you, are committed to doing something about it. I was one of those "wishful thinkers" for much of my life, until my childhood friend, the President of AcaiBurn.com, introduced me to AcaiBurn.

I was so impressed and thrilled with my weight loss success that I took the Customer Relations Manager position here, so my team and I can work closely with you to achieve your weight loss goals.

Even though the people of the Amazon have been taking Acai for hundreds of years to help reduce and maintain body weight, just taking it alone cannot reverse a poor diet with no exercise. Following a healthy diet along with a regular workout routine is a sure-fire way to get you looking and feeling the way you really want to. According to Dr. Nicholas Perricone, some foods can be eaten to help you look and age better! At the top of the list is Acai, which is one of the most nutritious and powerful foods in the world.

Another great strategy I found that kept me motivated was to read about others and get inspired by their success stories. After reading the success stories which we have received from people just like you on our website, you can clearly see that AcaiBurn is the secret to a slimmer, happier, and healthier you. It's the beginning of an incredible life-changing journey. And I want to make sure you get the most out of this amazing product.

Please Note: If you're still not seeing results after your Trial period, don't worry! You're still covered by our 60-Day Satisfaction Guarantee. Not everyone sees results at the same rate, so stick with it!

→ Your Success Today,

Sarah Nicholson

Sarah Nicholson
(866)-989-8945



NATIONAL
BREAST CANCER FOUNDATION
FUNDING RESEARCH FOR PREVENTION AND CURE
FUNDRAISING SUPPORT
JTM-I 00022

Customer Service Toll-Free Number: (866)-989-894

Become An *AcaiBurn* Success Story And Earn \$1,000

How To Win \$1000 With AcaiBurn

AcaiBurn, we stand behind our product and want to do everything we can to make sure you stick to the full AcaiBurn system until you've lost all of the weight you can. That's why we want to reward you for your success! If you use AcaiBurn and lose weight, we want to hear from you. Simply send us before and after pictures of yourself with a written testimonial telling how you used the AcaiBurn system to lose the weight so your experience can inspire others. If we decide to use your story, we will contact you that day – and provide you with \$1,000 that you can use to buy a new wardrobe for your incredible new body! So, remember, stay motivated and keep using the AcaiBurn system – and you could earn \$1,000!

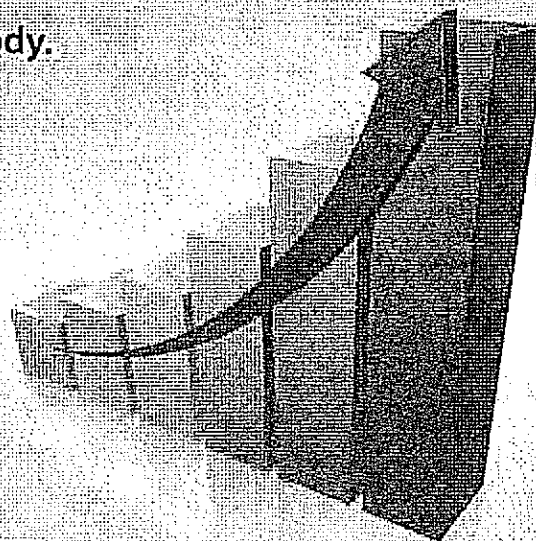
When Will I See Results? Your 12 week guide to your new body.

After two weeks. Your body has started to adjust and is rewarding you with an overall sense of wellness. You may not see substantial weight loss effects at this point, because your body's initial reaction to a new lifestyle is to hoard fat.

After four weeks. Your body will have now adapted to your new lifestyle and you should start losing weight. You may start looking forward to stepping on the bathroom scale again.

After two months. You should start getting comments from your friends about how great you are starting to look. Some may even be jealous! You should now really start to lose weight fast.

After three months. By this point, you may have hit your targeted weight and will be working on maintaining your new beautiful body. This is when you may be writing to us with a testimonial about how AcaiBurn has changed your life for the better.



Frequently Asked Questions

Does The AcaiBurn System Really Work?

The AcaiBurn system has helped thousands of people lose weight and keep it off. Of course, results vary from person to person. The key to losing the most weight possible with the AcaiBurn system is to keep yourself motivated. Our active ingredients were shown in double-blind studies to help people lose weight up to 4.5 times faster than the group given a placebo. Both groups were put on a diet and exercise program, which should be part of any weight loss plan.

How Long Will It Take To Get Results With AcaiBurn?

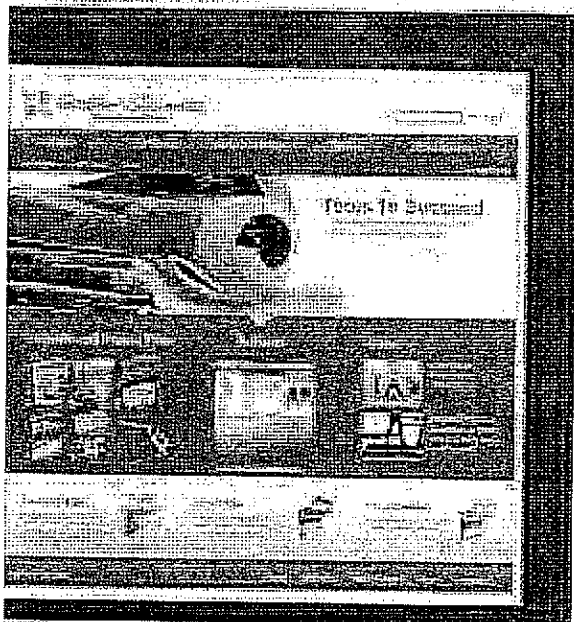
This varies from person to person. Healthy weight loss is never instantaneous. You don't want to arrive yourself when the goal is to look and feel healthy. Dropping weight too quickly can damage your cardiovascular system. Realistically, it will take your body some time to adjust to your new lifestyle. You may start feeling healthier in a matter of days, but it may take a few weeks before your weight loss results become obvious.

How To Use AcaiBurn

When you are ready to start losing weight, take one AcaiBurn capsule twice a day, approximately 30 to 60 minutes before breakfast and lunch. Consume at least six 8-oz. glasses of water per day. Read the entire label before use and follow directions. Do not exceed 2 capsules in a 24-hour period. Do not take within 3 hours of bedtime or you may have trouble sleeping. Keep up this routine in order to achieve your maximum weight loss results!



Become An *Academy* Success Story And Earn \$1,000



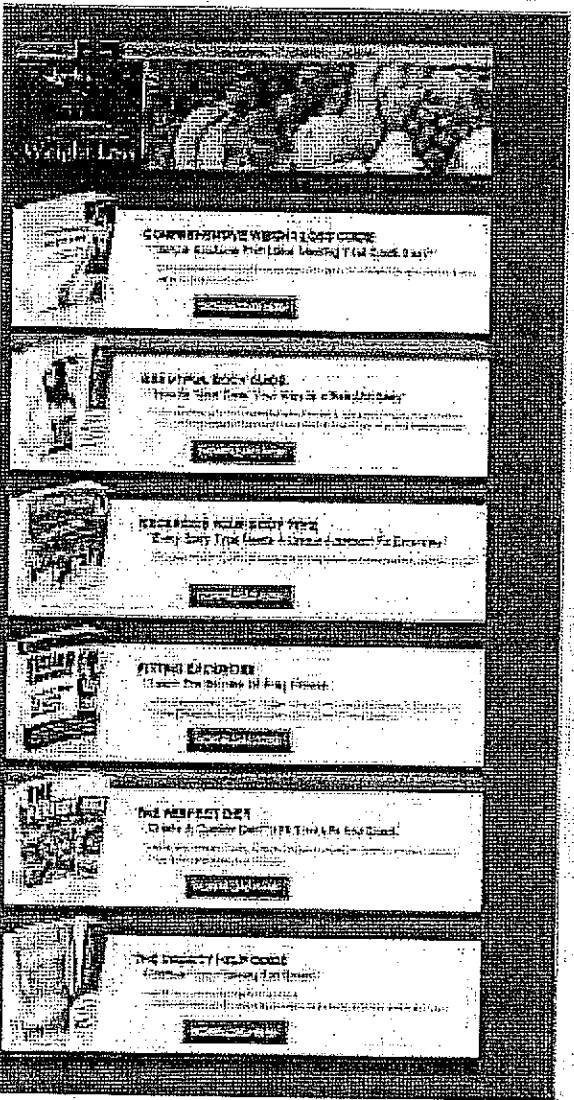
Insider Secrets To Weight Loss

Member Login: <http://www.insidersecretstips.com>

Username: insider

Password: getaccess

We understand how hard it is to live a healthy lifestyle. There is so much information out there, it's hard to know what to believe. You want to eat better and incorporate exercise into your healthy lifestyle, but don't have the information or tools to do it right. That's where we can help. Insider Secrets will provide you with information you can trust about how to eat right, exercise regularly and create overall wellness, so you'll look and feel better without fad diets, gimmicks or frustration.



Comprehensive Weight Loss E-book Package

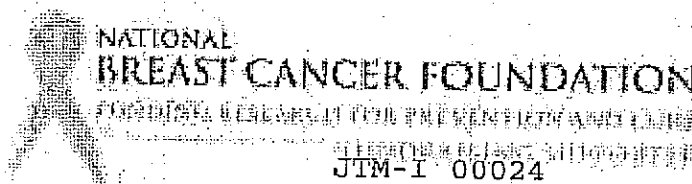
Member Login: <http://www.weightlossebookmembership.com>

Username: vip

Password: slim

Welcome to the Comprehensive Weight Loss Guide, where we'll show you everything you need to know to shed pounds, feel better and live a healthier lifestyle. We are committed to your overall wellness and to helping you lose weight, which is why we are providing these five guides to help you get the body you've always wanted.

These guides will teach you everything you need to know in order to finally lose weight and keep it off. You'll discover exercise routines that really work - while you discover how to work them into your busy lifestyle. We'll show you the real facts about obesity, and you'll learn about sensible diet plans that will help you slim down while you stay healthy. It's all part of our determination to provide you with the most comprehensive information about how to lose weight possible.

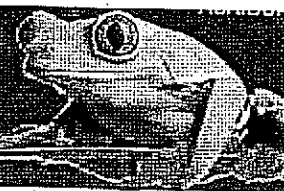


JTM-1 00024

Customer Service Toll-Free Number: 1-866-989-894

AcaiBurn

The Secret Of The Amazon



Dear Friend,

It's good to contact you again. I hope you have enjoyed your trial offer of AcaiBurn. I also want to congratulate you on deciding to continue to use AcaiBurn. This package contains your AcaiBurn System at the Preferred Customer discounted rate, so you can continue your weight loss program for years to come. This shows you are committed to bettering your body and improving your life. That makes me very proud of you! Now you know how I felt after my first month of using AcaiBurn and finally getting my diet plan together so I could have the body I've always wanted! You have broken the cycle of the yo-yo diet.

As the Customer Relations Manager for AcaiBurn, I want to keep working with you for months to come as you start to achieve your weight loss goals.

That's why I want to remind you, as a friend, that while AcaiBurn can help reduce and maintain body weight, you still need to keep up with your diet and exercise plan. Following a healthy diet along with a regular workout routine is a sure-fire way to get you looking and feeling the way you really want to. Remember that almost all doctors agree good food can help you live longer and look better. Acai is one of the foods that doctors believe can be a part of a nutritious diet plan.

Today, I'd like to ask you a personal favor. We are very interested in how AcaiBurn has helped make people's lives better while helping them get a better body. If you get a chance, could you please send me a brief note telling me how AcaiBurn has changed your life? And, if you have any diet secrets that you have discovered that work with AcaiBurn, I'd love to hear them too! Of course, I'm also available if you have any questions about the best ways to incorporate AcaiBurn into your overall diet and exercise plan. I want to be inspired by your success stories and also help you maximize your weight loss results.

You've now made the choice to include AcaiBurn as part of your long-term weightloss success. I can't wait to hear about how we have helped you feel confident, fit into your skinny clothes and find love while living a better life.

Your Success Today,

Sarah Nicholson

Sarah Nicholson
(866)-989-8945



NATIONAL
BREAST CANCER FOUNDATION
FUNDING RESEARCH FOR PREVENTION AND CURE
FUNDRAISING SUPPORT
JTM-I 00025

Customer Service Toll-Free Number: (866)-989-8945